

**IN THE UNITED STATE BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

IN RE: SHELBY PATEN

Bankruptcy No. 18-11243

**MOTION TO EXTEND DEADLINE TO FILE COMPLAINT TO DETERMINE
THE DISCHARGEABILITY OF A DEBT PURSUANT TO 11 U.S.C. § 523**

COMES NOW 1st Financial Services of MS, Inc. d/b/a Red Hills Finance (“Red Hills”) and files this motion for an extension of time within which to file a complaint to determine dischargeability of a debt pursuant to 11 U.S.C. § 523 or to deny discharge pursuant to 11 U.S.C. § 727 and/or to allow time for the filing of a Reaffirmation Agreement and Order. In support thereof, Red Hills would show unto the Court the following:

1. Debtor filed a petition for bankruptcy pursuant to Chapter 13 of the United States Bankruptcy Code on April 2, 2018. This Court has jurisdiction over the parties and subject matter pursuant to 28 U.S.C. §§ 157 and 1334 and 11 U.S.C. § 523. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A) and (1).

2. Red Hills request the Court to extend the deadline as to 1st Financial Services of MS, Inc. d/b/a Red Hills Finance to file a complaint to determine the dischargeability of a debt or to deny discharge or to file a Reaffirmation Agreement between the parties by an additional 60 days to August 31, 2018.

WHEREFORE, PREMISES CONSIDERED, 1st Financial Services of MS, Inc. d/b/a Red Hills Finance requests the Court to extend the deadline to file complaint to determine the dischargeability of a debt pursuant to 11 U.S.C. § 523 to August 31, 2018. Red Hills requests such additional and further relief as may be necessary under the circumstances.

DATED: July 2, 2018

Respectfully submitted,
1st Financial Services of MS, Inc. d/b/a Red Hills Finance

BY: /s/ B. Joey Hood, II
B. Joey Hood II, Attorney at Law, PLLC

CERTIFICATE OF SERVICE

I, B. Joey Hood, II, attorney for 1st Financial Services of MS, Inc. d/b/a Red Hills Finance does hereby certify that the following has been served electronically via ECF with a copy of the above document.

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|----|-------------------------|--------------------------------------|
| 1. | Robert H. Lomenick, Jr. | <u>rlomenick@gmail.com</u> |
| 2. | U. S. Trustee | <u>USTPRegion05.AB.ECF@usdoj.gov</u> |
| 3. | Henry J. Applewhite | <u>happlewhite@applewhitelaw.com</u> |

Date: July 2, 2018

/s/ B. Joey Hood, II
B. Joey Hood II, Attorney at Law, PLLC

B. Joey Hood II, Attorney at Law, PLLC
Attorney for 1st Financial Services of MS, Inc.
d/b/a Red Hills Finance
Post Office Box 759
Ackerman, MS 39735
Telephone (662) 285-4663
Telefax (662) 285-9948
MBN: 101147